

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

RODERICK WATSON,

Defendant

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CRIMINAL NO. PX-25-142

CONSENT MOTION TO PARTIALLY UNSEAL

The United States of America, by its attorneys, Lorinda I. Laryea, Acting Chief of the Fraud Section of the Criminal Division of the United States Department of Justice, and Kelly O. Hayes, United States Attorney for the District of Maryland, move this Honorable Court for an order partially unsealing the above-captioned matter. Specifically, the Government requests that the Court unseal the docket in this matter and all documents associated with this case, except for the documents identified below.¹

- Motion to Seal Case (Docket Entry #3)
- Order Granting Motion to Seal (Docket Entry #5)
- Transcript of Initial Appearance and Arraignment (Docket Entry #8)²
- Financial Affidavit (Docket Entry #9)
- Sealed Plea Supplement (Docket Entry #15)

¹ The Government has consulted with the Clerk's office and attempted to identify all documents and portions of documents that would appear on the public document and that would typically be under the Court's seal or that the Government is requesting remain under the Court's seal. To the extent not specifically identified, the Government respectfully requests that the Court continue to seal any documents or portions of transcripts that are normally sealed by the Court.

² After the transcript is prepared, the Government will propose that a redacted version be released.

- Order to Seal Case (Docket Entry #17)

Defendant, through counsel, consents to the relief requested herein.

WHEREFORE, the Government respectfully requests that the Court unseal the docket in this matter, but continue to seal the above-referenced documents.

Respectfully submitted,

Lorinda I. Laryea
Acting Chief
United States Department of Justice
Criminal Division, Fraud Section

_____/s/_____
Matt Kahn
Brandon Burkart
Trial Attorneys
United States Department of Justice
Criminal Division, Fraud Section

Kelly O. Hayes

United States Attorney
United States Attorney's Office
District of Maryland

_____/s/_____
Patrick D. Kibbe
Assistant United States Attorney
District of Maryland